

January 22, 2002

The Honorable Michael K. Powell
Chairman
Federal Communications Commission
445 Twelfth Street, S.W., Suite TW-A325
Washington, D.C. 20554

Re: Joint Competitive Industry Group Proposal Regarding Performance
Metrics and Installation Intervals for Interstate Special Access Services

Dear Chairman Powell:

The undersigned competitive telecommunications carriers, trade associations and the eCommerce & Telecommunications Users Group (eTUG) (the “Joint Competitive Industry Group”) urge the Commission to adopt performance measures, performance standards, and reporting requirements to govern the provision of special access services by incumbent local exchange carriers (LECs). Since release of the Commission’s Notice of Proposed Rulemaking in this proceeding, the Joint Competitive Industry Group has devoted considerable time and effort to the development of a coherent, practical, and enforceable set of such measures, standards and reporting requirements. The results of that effort are reflected in the attached Performance Measurements & Standards applicable to the provision of all interstate special access services by Tier 1/Class A incumbent LECs (Attachment A), as well as the attached proposal regarding Offered Installation Intervals (Attachment B).

The Joint Competitive Industry Group believes that its proposal accomplishes the following objectives:

- (1) A united competitive industry and user group view regarding the best way to achieve the quality of special access provisioning required to serve business customers;
- (2) A concise set of metrics that will induce proper provisioning and deter discrimination by incumbent LECs;
- (3) A set of metrics that can easily be incorporated into a remedy plan.

The Joint Competitive Industry Group therefore urges the Commission to adopt the Group's proposal regarding performance metrics and installation intervals.

Sincerely,

The Joint Competitive Industry Group

Robert W. Quinn, Jr.
Federal Government Affairs Vice President
AT&T Corp.

Jake E. Jennings
Vice President – Regulatory Affairs
NewSouth Communications

Rebecca H. Sommi
Vice President Operations Support
Broadview Networks

JT Ambrosi
Vice President, Carrier and Government
Relations
PaeTec Communications, Inc.

Cathy Slesinger
Senior Vice President, Public Policy
Cable & Wireless

Kelsi Reeves
Vice President – Federal Government
Relations
Time Warner Telecom

David A. Fitts
Director-Regulatory Affairs
Choice One Communications Inc.

Donna Sorgi
Vice President, Federal Advocacy
Law and Public Policy
WorldCom, Inc.

Richard J. Metzger
Vice President – Regulatory and Public Policy
Focal Communications Corporation

R. Gerard Salemm
Senior Vice President, External Affairs
XO Communications, Inc

Paul Kouroupas
Senior Counsel, Worldwide Regulatory
and Industry Affairs
Global Crossing, Ltd.

John Windhausen, Jr.
President
**Association for Local Telecommunications
Services**

Dan M. Lipschultz
Associate General Counsel
McLeodUSA Corporation

H. Russell Frisby, Jr.
President
**Competitive Telecommunications
Association**

Lisa Korner Butler
Vice President – Regulatory & Industry
Relations
Network Plus

Brian Moir
General Counsel
**eCommerce & Telecommunications Users
Group**

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Attachments

cc: Commissioner Abernathy
Commissioner Copps
Commissioner Martin
Dorothy Attwood
Jeffrey Carlisle
Michelle Carey
Uzoma Onyeije
Magalie Roman Salas